

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Rocco Giofoletti, on behalf of themselves
and all others similarly situated,

Case No. 0:18-cv-03025 (JNE/ECW)

Plaintiff,

v.

Securian Financial Group, Inc., Minnesota
Life Insurance Company, Securian Life
Insurance Company, and Minnesota Mutual
Companies, Inc.

Defendants.

**Local Rule 7.1(c) Word Count Compliance Certificate Regarding
Memorandum in Support of Defendants' Partial Motion to Dismiss
Plaintiff's Complaint for Failure to State a Claim**

I, Shawn M. Raiter, certify that the Memorandum in Support of Memorandum in Support of Defendants' Partial Motion to Dismiss Plaintiff's Complaint for Failure to State a Claim complies with Local Rule 7.1(c).

I further certify that, in preparation of this Memorandum, I used Microsoft Word 2010, and that this word processing program has been applied specifically to include all text, including headings, footnotes, and quotations in the following word count.

I further certify that the above-referenced Memorandum contains 3,080 words.

Dated: December 14, 2018

Larson • King, LLP

By s/ Shawn M. Raiter
Shawn M. Raiter (#240424)
David M. Wilk (#222860)
2800 Wells Fargo Place
30 East Seventh Street
St. Paul, MN 55101
(651) 312-6500
sraiter@larsonking.com
dwilk@larsonking.com

and

Robert D. Phillips, Jr.
(Admitted *Pro Hac Vice*)
Kimberly K. Chemerinsky
(Admitted *Pro Hac Vice*)
Gillian H. Clow
(Admitted *Pro Hac Vice*)
Alston & Bird, LLP
333 South Hope St, 16th FL
Los Angeles, CA 90071
(213) 576-1000
bo.phillips@alston.com
kim.chemerinsky@alston.com
gillian.clow@alston.com